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April 28th, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Connect America Fund, WC Docket No. 10-90
Pierce Telecommunications, Inc. Challenge to A-CAM v2.2
Split Census Blocks

Dear Ms. Dortch:

Pierce Telecommunications, Inc. challenges the support provided by the Alternative Connect America Cost Model for census blocks whose boundaries encompass a neighboring incumbent local exchange carrier. Per the protective order, a redacted version of this document has been filed via the FCC Electronic Comment Filing System.

Sincerely,

A handwritten signature in black ink, appearing to read "Will Fogle", is written over a light blue horizontal line.

Will Fogle
Vice President
Pierce Telecommunications, Inc.
112 S 5th Street
Pierce, NE 68767
402-329-6225

cc: Katie King
Margaret Avril Lawson

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter Of

Connect America Fund

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WC Docket No. 10-90

A-CAM SPLIT CENSUS BLOCK CHALLENGE

Filed: April 28th, 2016

Pierce Telecommunications, Inc. ("PTI") submits the following information regarding the Alternative Connect America Cost Model ("A-CAM") data which was used to establish the support levels for census blocks in PTI's exchange. Calculations made under A-CAM caused census blocks on the border of PTI's exchange to be classified as supported based on the presence of a neighboring incumbent local exchange carriers ("ILECs") facilities. The census blocks are classified as supported despite the fact there is no overlapping geography between ILECs in the services areas. The latest data from the model does not provide support for [REDACTED] total locations (encompassed in [REDACTED] census blocks) where PTI provides service, reducing PTI's support by approximately [REDACTED] per year. This reduction of support reflects a significant decrease from the amount PTI feels would be the proper support level, [REDACTED] per year. These locations, merely due to their geographic proximity to a non-competitive ILEC, receive no support and are treated in a different manner than locations in the vast majority of PTI's exchange. The treatment of these locations is contrary to the premise that all customers should receive the same quality of service, which becomes impossible due to the lack of support for the high cost locations near the boundary of PTI's exchange.

PTI requests the FCC re-examine the treatment of census blocks which have multiple ILEC's providing service to locations which are not geographically overlapping. The lack of support provided by the model for these locations prevents ILEC's, such as PTI, from connecting every location with state-of-the-art broadband.

Sincerely,



Will Fogle
Vice President
Pierce Telecommunications, Inc.
112 S 5th Street
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